

JAP:ACG

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

– against –

COMPLAINT  
(T. 31, U.S.C. § 5332)

IGNACIO SILVESTRE MORLA,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

BRIAN COLICA, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (“HSI”), duly appointed according to law and acting as such.

Upon information and belief, on or about June 26, 2015, within the Eastern District of New York, the defendant IGNACIO SILVESTRE MORLA did knowingly and with the intent to evade the currency reporting requirements under Title 31, United States Code, Sections 5316(a)(1)(A) and 5316(b), conceal more than \$10,000 in currency and other monetary instruments, to wit, approximately \$370,000 in United States currency, on his person and in articles of luggage and other containers, and transport and transfer and attempt to transport and transfer such currency and monetary instruments from a place within the United States to a place outside of the United States.

(Title 31, United States Code, Section 5332)

**15M 588**

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

1. Your deponent has been with ICE for approximately 5 years. I am familiar with the facts contained in this affidavit as a result of my participation in the investigation of the bulk cash smuggling discussed in this affidavit, which includes, but is not limited to, my review of the file and conversations with other law enforcement personnel assisting with the investigation.

2. On or about June 26, 2015, the defendant IGNACIO SILVESTRE MORLA, a citizen of the Dominican Republic, boarded Delta Airlines flight 450 to Santiago, Dominican Republic departing from John F. Kennedy International Airport in Queens, New York.

3. Officers from Customs and Border Protection ("CBP") examined the baggage checked by the defendant IGNACIO SILVESTRE MORLA before it was loaded on the flight. The examination of the checked baggage revealed approximately \$370,000 in United States currency, which had been rolled into the pant legs of jeans and placed under other clothing items in both suitcases.

4. CPB officers reported to the defendant's flight and requested that the defendant return to the jetway, where CPB officers spoke to the defendant in Spanish. CPB officers informed the defendant IGNACIO SILVESTRE MORLA of the currency reporting regulations, and presented a customs form in Spanish (form "CP-909- Spanish Version") for the defendant to read.

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<sup>1</sup> Because the purpose of this affidavit is to set forth only those facts necessary to establish probable cause, I have not set forth all the facts and circumstances of which I am aware.


5. After the defendant IGNACIO SILVESTRE MORLA finished reading the customs form, CBP officers asked him to declare all of the currency that he was transporting for himself and for any other person. CBP officers also informed the defendant that he was required to declare all currency that the defendant was carrying in checked luggage and carry-on luggage, whether in the form of cash, checks, money orders or other negotiable instruments.

6. The defendant read the CP-909 Form, wrote that he was transporting \$6,000 in United States currency, and signed the form.

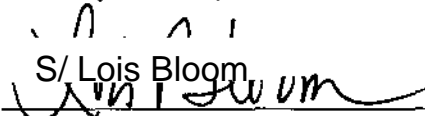
7. CPB officers asked the defendant to present the currency he was carrying and the defendant presented approximately \$6,300 from his person. CPB officers then asked the defendant if he had any other currency. The defendant, in sum and substance, responded in the negative.

8. CPB officers took the defendant into custody and contacted HSI. HSI agents responded and the defendant IGNACIO SILVESTRE MORLA was advised of his right to counsel. The defendant invoked his right and requested an attorney.

WHEREFORE, your deponent respectfully requests that the defendant  
IGNACIO SILVESTRE MORLA be dealt with according to law.

  
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BRIAN COLICA  
SPECIAL AGENT  
HOMELAND SECURITY  
INVESTIGATIONS

Sworn to before me this  
26th day of June, 2015

  
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S/ Lois Bloom  
HONORABLE LOIS BLOOM  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK